

1 THE HONORABLE RONALD B. LEIGHTON

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT TACOMA

9 JIUSAN GROUP TIANJIN SOYA SCIENCE AND
10 TECHNOLOGY CO. LTD., a Chinese corporation,

11 Plaintiff,

12 v.

13 ANGELAKOS LTD., ANGELAKOS (HELLAS)
14 S.A., HISPANIA GRAECA SHIPPING LTD.,
AFRICA GRAECA SHIPPING LTD.,

15 Defendant(s).

IN ADMIRALTY

No. 3:19-cv-06043-RBL

**DECLARATION OF MARY C.
BUTLER IN SUPPORT OF MOTION
FOR ORDER DEPUTIZING BUCK
FOWLER**

16 I, MARY C. BUTLER, declare as follows:

17 1. I am one of the attorneys for Plaintiff Jiusan Group Tianjin Soya Science and
18 Technology Co. Ltd. in the above-captioned action, am over the age of 18, and make the
19 following statements based upon my own personal knowledge.

20 2. On November 5, 2019, my office called the Puget Sound Marine Exchange to
21 request information about the date the vessel M/V AFRICA GRAECA (IMO No. 9221621)
22 will be leaving the District. The Puget Sound Marine Exchange advised that the M/V
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1 AFRICA GRAECA is currently at anchor in Tacoma, Washington and presently had no
2 information about the date the Vessel is leaving.

3 3. Before Plaintiff filed the Verified Complaint to initiate this action (Dkt.
4 No. 1), I attempted to contact the U.S. Marshal's office for the Western District of
5 Washington to notify them of the potential arrest and make arrangements for service of the
6 writ. I called and left messages for Michele Stiltner, a property specialist who is responsible
7 for admiralty and civil process, on October 25, 2019, November 1, 2019, and November 4,
8 2019. I was unable to speak with Ms. Stiltner and did not receive a return telephone call.

9 4. On November 4, 2019, I called the U.S. Marshal's main office at 3:15 pm and
10 was advised that the office was "closed."

11 5. On November 4, 2019, I called Ed Muldowney at the U.S. Marshal's office
12 but I could not reach him and was not given an option to leave a message. I was informed
13 later that he is retired.

14 6. On November 4, 2019, I called Doris Harriman, whom I understand works
15 with Ms. Stiltner at the U.S. Marshal's office, and left a message notifying her about the
16 potential arrest and asking to speak with someone about the availability of a deputy.

17 7. On November 5, 2019, after this Court issued the writ of attachment (Dkt.
18 No. 9), I visited the U.S. Marshal's office and was advised that Ms. Stiltner is out of the
19 office for medical reasons, and her return date is unknown. I was also advised that Ms.
20 Stiltner was the only individual at the U.S. Marshal's office who handles admiralty matters,
21 and the U.S. Marshal's office was unlikely to serve the writ of attachment until Ms. Stiltner
22 returned to the office.
23

8. Attached as **Exhibit 1** is a true and correct copy of an Order Deputizing James W. Scheel to Act In Lieu of U.S. Marshal in Serving Warrant of Arrest of M/V DARYA VISHNU issued in *Chemoil Corporation v. M/V DARYA VISHNU*, No. 3:13-cv-5494-RBL, in the U.S. District Court for the Western District of Washington.

I HEREBY DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS
OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND
CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED this 5th day of November, 2019 at Seattle, Washington.

By: s/ Mary C. Butler
Mary C. Butler, WSBA #44855

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